

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

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In re:

*Integratel Perú S.A.A.*,<sup>1</sup>

Debtor in a Foreign Proceeding.

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)  
)  
) Case No. 25-90022 (ARP)  
)  
) Chapter 15  
) **Re: Docket Nos. 2, 76**  
)

**FOREIGN REPRESENTATIVE’S WITNESS AND EXHIBIT LIST FOR HEARING  
SCHEDULED FOR JUNE 25, 2025 AT 11:00 A.M. (PREVAILING CENTRAL TIME)**

Timothy O’Connor (the “**Petitioner**” or the “**Foreign Representative**”), in his capacity as Petitioner and Foreign Representative of the above-captioned debtor (the “**Chapter 15 Debtor**”) hereby files this Witness and Exhibit List for the hearing to be held on **June 25, 2025 at 11:00 a.m. (prevailing Central Time)** (the “**Hearing**”) as follows:

**WITNESSES**

The Foreign Representative may call any of the following witnesses at the Hearing:

1. Foreign Representative;
2. Jose Antonio Jimenez;
3. Any witness necessary to authenticate a document;
4. Any witness called or listed by any other party;
5. Any witness necessary to rebut the testimony of any witnesses called or designated by any other parties; and
6. The Foreign Representative reserves the right to cross-examine any witnesses called by any other party.

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<sup>1</sup> The debtor in this chapter 15 case and the last four digits of the tax number in the jurisdiction in which it pays taxes is Integratel Perú S.A.A. (7491 – Peru).

**EXHIBITS**

The Foreign Representative may introduce the following exhibits:

<b>EXHIBIT NO.</b>	<b>DESCRIPTION</b>	<b>OFFERED</b>	<b>OBJECTION</b>	<b>ADMITTED</b>	<b>DATE</b>
<b>1.</b>	<i>Chapter 15 Petition Form</i> [Docket No. 1]				
<b>2.</b>	<i>PCO Petition Form</i> [Exhibit A-1 to Docket No. 1]				
<b>3.</b>	<i>PCO Petition Filing Certificate</i> [Exhibit B-1 to Docket No. 1]				
<b>4.</b>	<i>Board Resolutions Appointing Foreign Representative</i> [Exhibit C-1 to Docket No. 1]				
<b>5.</b>	<i>Petitioner's Declaration and Verified Petition for Recognition of Peruvian Proceeding and Motion for Related Relief Pursuant to 11 U.S.C. §§ 105, 1509, 1515, 1517, 1520 and 1521</i> [Docket No. 2]				
<b>6.</b>	NY Notes Offering Memorandum [Docket No. 2-3]				
<b>7.</b>	<i>Declaration of Jose Antonio Jimenez Pursuant to 28 U.S.C. § 1746 in Support of the Petitioner's Declaration and Verified Petition for Recognition of Peruvian Proceeding and Motion for Related Relief Pursuant to 11 U.S.C. §§ 105, 1509, 1515, 1517, 1520 and 1521</i> [Docket No. 3]				
<b>8.</b>	Peruvian Insolvency Law [Docket No. 3-1]				
<b>9.</b>	INDECOPI Statement [Docket No. 3-3]				
<b>10.</b>	<i>Statement Notifying the Court of Developments in the Peruvian Restructuring Proceeding Pursuant to 11 U.S.C. § 1518</i> [Docket No. 80]				
<b>11.</b>	INDECOPI Resolution [Exhibit A to Docket No. 80]				
<b>12.</b>	INDECOPI Notice [Exhibit B to Docket No. 80]				
<b>13.</b>	Any document or pleading filed in the above-captioned main cases.				
<b>14.</b>	Any exhibit necessary for impeachment and/or rebuttal purposes.				
<b>15.</b>	Any exhibit identified or offered by any other party.				

**RESERVATION OF RIGHTS**

The Foreign Representative reserves the right to call or introduce one or more, or none, of the witnesses and exhibits listed above, and further reserve the right to supplement, modify, or amend this list prior to the Hearing.

*[Remainder of Page Intentionally Left Blank]*

Dated: June 23, 2025  
Houston, Texas

/s/ Charles R. Koster

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*Attorneys for Timothy O'Connor, as Petitioner  
and Foreign Representative*

**Certificate of Service**

I certify that on June 23, 2025, I caused a copy of the foregoing document to be served via electronic mail, U.S. mail, or first-class postage, as applicable, and by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Charles R. Koster

Charles R. Koster